

RESPONSE TO COMMENTS
East Tennessee Technology Park
Oak Ridge, Tennessee

This document has been prepared in accordance with Tennessee Rule 1200-1-11-.07(7)(j). It has resulted from the Tennessee Division of Solid Waste Management's issuance of a draft permit (renewal) to U.S. Department of Energy (DOE) and co-operated by Bechtel Jacobs Company, LLC; WESKEM, LLC; and Shaw Environmental, Inc., for East Tennessee Technology Park (ETTP), located at Blair Rd., Tennessee Highway 58, Oak Ridge, TN 37831-7136, EPA ID Number TN0 89 009 0004. The permit conditions allow the operation and maintenance of a container storage and treatment unit, at East Tennessee Technology Park (ETTP). The corrective action conditions for the solid waste management units and areas of concern are included in a separate hazardous waste permit, TNHW-010.

Part A of this document describes the efforts made by the Tennessee Division of Solid Waste Management (DSWM) to obtain public input. Part B summarizes and responds to all significant comments received.

A. Public Involvement Opportunities

ETTP, issued a pre-application public notice in the in the Oak Ridger, Roane County News, Press Enterprise and the Knoxville News Sentinel on, February 25, 2002, stating that a public meeting would be conducted on March 26, 2002, concerning the renewal application. The meeting was held on March 26, 2002 at the Jacobs Technical Center in Oak Ridge, Tennessee. Two people from the community attended the meeting. Comments were received at this meeting. DSWM received the Part A and Part B permit renewal application on April 1, 2002, including documentation of this meeting. DSWM prepared a public noticed of receipt for the applications, which were public noticed by ETTP on April 17, 2002.

A public notice was prepared by DSWM of its intent to reissue the hazardous waste permit and it was public noticed by DOE and Bechtel Jacobs Company, LLC; WESKEM, LLC; and Shaw Environmental, Inc., (ETTP), in the January 15, 2004, edition of The Oak Ridger. Several (30 second) announcements of the action referencing the notice published in the newspaper were provided over two local radio stations (WATO-AM, Knoxville & WKVL-AM/FM, Knoxville). The Public Notice advised that copies of ETTP's application, the draft permit, fact sheet and public notice were available for public inspection at the Oak Ridge Public Library, Civic Center, 1401 Oak Ridge Turnpike, Oak Ridge, TN; TDEC Knoxville Environmental Assistance Center, Public Access Area, Suite 220 – State Plaza 2700 Middlebrook Pike., Knoxville, TN 37921; Kingston Public Library, 1004 Bradford Way, Kingston, TN; DOE Oak Ridge Public Reading Room, 475 Oak Ridge Turnpike, Oak Ridge, TN; TDEC Department of Energy Oversight Division Office, 761 Emory Valley Rd., Oak Ridge, TN. The notice also established a 45-day public comment period (ending February 29, 2004) and described how interested person(s) could comment in writing on the proposed actions. It further described that any interested person could request a public hearing or obtain further information.

B. Public Comment/Response Summary

The only comments received were from ETTP and DSWM. These comments are addressed below.

1. **Comment:** In the proposed title page heading, change the Unit(s) from "K-1423-B Dike WSPU and K-1423 CPF" to "K-1423-Dikes B, E, and CPF WSPU" and also in the proposed units on the title page heading added after K-1423 WSPU Repackaging Area, "and K-1423-A dike WSPU"; in the proposed title page heading for the first set of units, delete, "and Shaw Environmental, Inc."; in the proposed title pages in the headings, change the word "Installation" to "EPA" (the main two front pages, Table of Contents headers and pages I-1, II-1, III-1, IV-1, V-1, and VI-1).

Response: The changes have been made.

2. **Comment:** In the first paragraph, third sentence in the proposed title page add U.S. Department of Energy; Bechtel Jacobs Company, LLC; WESKEM, LLC; and Shaw Environmental, Inc. Also, reverse the latitude and longitude.

Response: The changes have been made.

3. **Comment:** In the Standard Conditions, Effect of Permit, The facility proposes to add, "The permittee is also allowed to repackage hazardous and/or mixed waste. Management of hazardous and/or mixed wastes can include elemental neutralization and removing incidental liquids by decanting, if necessary, or adding an absorbent material provided the absorbent material is added to the hazardous and/or mixed waste in unit(s) permitted to store such waste" (page I-1).

Response: Instead of the proposed change, the first sentence of the paragraph will now include treatment as requested per earlier Class 2 Modification dated, September 6, 2003. Treatment allowed will be better described in Section III and Attachment 8 of the permit. The permittee is allowed to repackage, etc., will not be made in this section of the permit, but will be made in the Container Management section in Attachment 8 (page I-1). The word "incidental" was, deleted from the attachment per email request dated, August 5, 2004.

4. **Comment:** In the Standard Conditions, remove the words "for the purposes of this permit" from definitions numbers 1 through 9, 11 through 14, and 16 through 18 (pages I-2 through I-4).

Response: The changes have been made.

5. **Comment:** In the proposed subparagraph I.D.9 (b) change "J" to "K" (page I-6). Also in subpart I.D.11.(b)(ii) (II) change "I.D.11(b)(ii)(I)" to "I.D.11.(b)(i)" (page I-7); in part I.D.11. (h), and (i) change "J" to "K" (page I-9).

Response: The changes have been made.

6. **Comment:** In the proposed subparagraph II.C.2.(b) change "B" to "C" (page II-1); in part II.C.2. (b)(vi) change "F" to "G" and change "N" to "O", "O" to "P", "P" to "Q" and "Q" to "R" (page II-2); in subparagraph II.C.2.(c) change "B" to "C"; in subparagraph II.C.3.(b) change "B" to "C" (page II-2).

Response: The changes have been made.

7. **Comment:** In the proposed paragraphs II.F.4.(b), (c) and (d) change "E" to "F" (pages II-4 and II-5).

Response: The changes have been made.

8. **Comment:** In the proposed paragraph II.G.3 change "F" to "G" (page II-5).

Response: The change has been made.

9. **Comment:** In the proposed subparagraph II.H.7.(a) Personnel Protection, replace the word "procedures" with the word "practices"; in the proposed subparagraph II.H.7.(b) change "II.H.7(a)" to "II.H.7.(a)" and change the "G" to "H" (page II-7).

Response: The changes have been made.

10. **Comment:** In the proposed subparagraphs II.I.3.(a), and (c) change the "H" to "I"; in II.I.3.(c) replace the text to read, "The contingency plan, Attachment 6, shall list the address and phone number of the PSS office which is constantly manned by a person qualified to act as emergency coordinator (see paragraph II.I.6)" (page II-8); and in the proposed part II. I.7.(i) change the "H" to "I" (page II-11).

Response: The changes have been made.

11. **Comment:** In the proposed subparagraph II.J.1.(b) change "I" to "J" and in the Note change "B" to "C" and "I" to "J" (page II-11); in paragraph II.J.2.(b) change "I" to "J" and "B" to "C" (page II-12); in paragraph II.J.5 change "J" to "K" and "n" to "m" (page II-13).

Response: The changes have been made.

12. **Comment:** In the proposed subparagraph II.K.1.(c) change "B" to "C", "F" to "G", "N" to "O", "O" to "P", "P" to "Q", and "Q" to "R"; in II.K.1.(d) change "H" to "I"; in II.K.1.(e) change "D" to "E"; in II.K.1.(f) change "O" to "P", "P" to "Q", and "Q" to "R"; and in subparagraph II.K.1.(m) change "I" to "J" (page II-15).

Response: The changes have been made.

13. **Comment:** In the proposed paragraph II.K.5 Additional Reports, change “J” to “K”; in II.K.5.(a) change “H” to “I”; in II.K.5.(b) change “K” to “L”; and in II.K.5.(c) change “O” to “P”, “P” to “Q” and “Q” to “R” (page II-16).

Response: The changes have been made.

14. **Comment:** In the proposed subparagraph II.L.2.(d) change “K” to “L”; II.L.(4) change “K” to “L”; in II.L.5.(a)(i)(1) change “K” to “L” (page II-18); in II.L.5.(c) change “K” to “L” (page II-19); in II.L.5.(c)(i) change “K” to “L”; and in II.L.5.(c)(ii) change “K” to “L”; in II.L.7 change “II.M.6 through 10” to “N”; in II.N. change “M” to “N” (page II-20); II.P.2 change “O” to “P” (page II-21); and in II.P.3.(a) change “O” to “P” (page II-22).

Response: The changes have been made.

15. **Comment:** In the proposed section III. heading and first sentence, add the words “and treatment”; III.A.2, delete the words with “free liquids”; delete container K-1025-C WSU; add treatment capacities for the units as previously requested in Class 2 Modification dated September 6, 2003 (page III-1).

Response: The changes have been made. Closure was approved for K-1025-C WSU on June 28, 2004.

16. **Comment:** In the proposed paragraph III.D.4, change “II.G.5” to “II.H.5”; III.D.5, delete the word “free”; III.D.7 change “II.F” to “II.G”; and III.D.7, delete the words “or reactive” (page III-3).

Response: The changes have only been partially made. The requested wording changes have not been made as they are standard rule and/or permit language.

17. **Comment:** In the proposed paragraph III.F.2, add, “Where containers of liquids are stored” and replace capital “A” with a small “a”; and in III.F.2(c), add, “Containers of hazardous waste liquids only need to be considered in this determination” (page III-4).

Response: The changes will not be made. No consideration has been made of what will be done for storage areas to meet the requirements of Tennessee Rule 1200-1-11-.06(6)(9)(f) 3 and 4. To meet these requirements and to allow for storage of solids only, the first sentence of III.F.1 of the permit has been modified to read, “As requested by Tennessee Rule 1200-1-11-.06(9)(f)1 the permittee shall ensure that the container storage areas have a containment system that is designed and operated in accordance with paragraph III.F.2 below. The containment system must be constructed and maintained as specified in the plans and specifications found in Attachment 8. When normal maintenance or replacement of equipment or minor piping rearrangements are necessary to properly operate the facility, the permittee shall use parts or items which meet or exceed the performance standards of those set forth in the attachments. If parts or items are to be used which do not meet or exceed the standards set forth in the attachments, prior approval from the Commissioner shall be required”.

18. **Comment:** In the proposed paragraph III.H.1 change “F” to “G”; and in III.I, at the end of paragraph change “K” to “L” (page III-5).

Response: The changes have been made.

19. **Comment:** In the proposed Attachment 1, in the Table of Hazardous Waste Codes, delete K-1025-C WSU. The storage container is closed.

Response: The change has been made. Closure was approved for K-1025-C WSU on June 28, 2004.

20. **Comment:** In the proposed Attachment 2, section 2.1 Physical and Chemical Characteristics of the Waste, add in the first sentence of the first paragraph the words, “contained gases” after the word sludges. Also, add in the last sentence of the first paragraph the words, “but are not limited to” after the word “include” (page 2-2).

Response: The changes have been made.

21. **Comment:** In the proposed Attachment 2, subsection 2.2.1 in the title “Generator Characterization and Waste Certification Program”, delete “and Waste Certification Program” from the title; and in the paragraph in the first sentence replace “The Oak Ridge Reservation Waste Certification Program Plan establishes” to read, “A program has been established that includes the requirements and responsibilities for”; and delete, “certification of”; in the same paragraph, replace, “a Universal Code Number (UCN)-2109 formset which certifies the waste, along with analytical data and process knowledge”, to read, “information required for the proper disposition of a waste stream (see example forms in Appendix 2-1)”; add in the paragraph “This information is required to ensure that the waste can be properly handled, managed, and stored in the permitted units”; replace “WAC” with “waste acceptance criteria for each unit”; and delete, “(also referred to as Master Waste Profiles) for the ORR”; replace “The Master Waste Profiles” with “Typical waste profiles”; then next to the last sentence delete “depicts the” and replace with “illustrates a typical” and delete the word “profile”; and in the last sentence in the paragraph delete “indicates which specific Master Waste Profile is” replace with “illustrates the typical flow process” (page 2-3).

In the second paragraph, replace “WAC identified in each Master Waste Profile”, with “waste acceptance criteria for each unit typically includes” (page 2-3).

In the third paragraph, delete the words “of a waste profile” and delete the second and third sentences (page 2-4).

Response: The changes have been made, except for those in the third paragraph in the first sentence. It will state “An example of a waste profile is included in Appendix 2-2”.

22. **Comment:** In the proposed subsection 2.2.1, add subsections "2.2.1.a Legacy Wastes and subsection 2.2.1.b Secondary Waste Streams " (page 2-4).

Response: The changes will not be made, as there was not any justification provided to make this change. The permittee may always provide justification and request a permit modification at a later date.

23. **Comment:** In the proposed subsection 2.2.2, replace "WAC" with the words "waste acceptance criteria" (page 2-4).

Response: The changes have been made.

24. **Comment:** In the proposed subsection 2.2.4, delete "The initial characterization data will be reviewed to ensure that the analysis is accurate and up to date". At the end of the second sentence add the words "by the generator" after the word "revalidated" (page 2-4).

Response: The changes have been made.

25. **Comment:** In the proposed, delete subsection 2.2.5 Packaging Requirements (page 2-4).

Response: The change has been made.

26. **Comment:** In the proposed sections and subsections replace the letters "WO" with the words "waste operations": in Attachment 2, subsection 2.2.6 the subsection number for Waste Operations, change to 2.2.5; subsection 2.2.5 (2.2.6) the first sentence in the paragraph, replace "(WO)" with the words, "Waste operations personnel" (page 2-5); subsection 2.2.7 (2.2.6) Waste Verification; subsection 2.2.7 Additional Requirements for Waste Generated Off-Site, bullets (•) four and six (page 2-6); section 2.3, the Recordkeeping Manifest Requirements (page 2-7);

Attachment 3, replace the letters "WO" with the words "waste operations personnel", section 3.2, subsection 3.2.1, Security Procedures and Equipment in the third paragraph (page 3-2); subsection 3.2.2, 24 Hour Security Surveillance System the second paragraph (page 3-2); section 3.2, subsection 3.2.3, Barrier and Means to Control Entry, in the second sentence (page 3-3); section 3.2, subsection 3.2.4, Warning Signs, in the eight sentence (page 3-3);

Attachment 4, replace the letters "WO" with the words "waste operations personnel", section 4.1, in the first paragraph (page 4-2); subsection 4.2.1 Records Availability, Retention, and Disposition in Inspection Record, in the third sentence (page 4-4);

Attachment 5, replace the letters "WO" with the words "waste operations", in Subsections: 5.2.1 in the first sentence (page 5-2); 5.2.2 in the first and third paragraph (pages 5-2 and 5-3); 5.3.1 in the first sentence (page 5-4); 5.3.2 in the second paragraph (page 5-4); in Subsection 5.2.1, in the first sentence replace the letters "WO" with the words "waste operations personnel" (page 5-2).

Attachment 8, replace the letters "WO" with the words "waste operations" in subsections: 8.2.2, in the second paragraph, second sentence (page 8-9); 8.4.1, at the end of the fourth paragraph (page 8-12); and 8.4.5, in the second paragraph in the first and second sentence (8-14).

Response: The changes have been made.

27. **Comment:** In the proposed subsection 2.2.6 (2.2.5), in the first paragraph, delete "UCN-2109" and add the word "characterization". At the end of the first sentence, delete the word "Master", and change the words "waste profiles" to lower case. Also, at the end of the last sentence add, "into the unit with the exception of secondary waste", in the second paragraph, at the end of the first sentence add the word "disposition"; add the words "This may include" before the word "reuse"; delete in the third sentence "ORR waste disposition specialists work with receiving TSDF waste acceptance personnel to" and replace to "Waste operations personnel determine the treatability of candidate wastes" (page 2-5).

Response: The changes have been made, except for the change regarding "secondary wastes". See the response to Comment Number 21, for this request.

28. **Comment:** In the proposed, delete subsection 2.2.7 (2.2.6) Waste Verification (page 2-5).

Response: The change will not be made, as there was no justification for the change.

29. **Comment:** In the proposed subsection 2.2.8 change the number to subsection 2.2.7 Additional Requirements for Waste Generated Off-Site; in the second paragraph, delete the first sentence, in the same paragraph, at the end of the third sentence after the word "generator" add the statement, "until received into the storage unit". Also, in the subsection, in the first bullet, in the first line after the word "for", add the words, "the appropriate" and change the word "parameters" to "parameter(s)" (page 2-5).

Response: The changes have been.

30. **Comment:** In the proposed section 2.3 OPERATING RECORD INFORMATION, in the Waste Acceptance, the third sentence after the word "form", add the words "with information"; in this paragraph, in the third sentence add the word "example"; delete, "form Request for Disposal/Storage of Waste Materials and Equipment, Form UCN-2109"; delete "for identification of waste material movements after appendix 2-1";

delete the sentence "These forms are consecutively numbered to facilitate entry into the waste tracking system." In the last sentence replace the words "Waste Analysis Plan" with "operating records" (page 2-6).

Response: The changes have been made.

31. **Comment:** In the proposed section 2.3, the Waste Inventory subsection, in the second sentence delete the word "the" and replace with "a" and delete the last sentence and replace with, "The waste information is recorded on a waste tracking and recordkeeping form and maintained in the operating record. Each container of hazardous waste is assigned a unique number. The tracking form requires the following information: drum number; weight; sender or destination; and date received at the waste storage unit"; add a second paragraph, "Examples of the waste tracking and recordkeeping forms are shown in Appendix 2-1; however, the exact forms presented in the appendix are not required as long as all information on the forms is included" (page 2-7).

Response: The changes have been made.

32. **Comment:** In the proposed section 2.3, the Off-Site Notices to Generators, subsection, end the second sentence after the word "facilities"; delete the words "generators, or other TDEC approved generators"; and start the third sentence with the word "Therefore" (page 2-7).

Response: The changes have been made.

33. **Comment:** In the proposed section 2.3, the Recordkeeping Manifest Requirements, subsection, delete in the first paragraph sentences 1-5; in the paragraph delete the last three sentences and delete the first sentence in the second paragraph (pages 2-7 and 2-8).

Response: State agrees changes have been made.

34. **Comment:** In the proposed Figure 2.1 flowchart, add the word "Typical" (page 2-9).

Response: The change has been made.

35. **Comment:** In the proposed Table 2.1 heading, delete the words "Oak Ridge Reservation Waste Certification Program" and "Master" in the title and add the word "Typical" in the title of the table so that it reads, "Typical Hazardous and Mixed Waste Profiles" (page 2-15).

Response: The changes have been made.

36. **Comment:** In the proposed Attachment 3, section 3.2, subsection 3.2.1 Security Procedures and Equipment, in the first paragraph, in the second sentence delete K-1025-C; in the second paragraph in the first sentence after, the words “K-1065-A WSU” delete the rest of the paragraph and replace with “and will include placing some waste containers inside sealand containers within an interior fenced area” (page 3-2).

Response: The changes have been made.

37. **Comment:** In the proposed Attachment 3, section 3.2, subsection 3.2.3 Barrier and Means to Control Entry in the first sentence delete K-1025-C (page 3-3).

Response: The change has been made.

38. **Comment:** In the proposed Attachment 4, section 4.1, Inspection Schedule, the second paragraph change to become the last paragraph in the section and add a new second paragraph to read. “Inspections will not be conducted if the conditions of the facility (or unit) are such that the health and safety of personnel may be threatened. Such conditions may be present during emergency situations, or due to severe weather conditions (e.g., ice on walkways in or around storage areas). If all or portions of inspections are not conducted for health and/or safety reasons, the reason the inspection could not be completed and the portion of the facility inspection not completed will be documented on the inspection form”. Also in the last paragraph a second sentence was added at the end; “All equipment listed in the contingency plan will be inspected as specified in the contingency plan” (page 4-2).

Response: The changes have not been made. Not conducting inspections due to health and safety reasons is a matter for compliance review discretion and not permitting. Such instances should be recorded on the inspection logs.

The equipment list must be included in the inspection section.

39. **Comment:** In the proposed subsection 4.1.3 Specific Process Inspection Requirements, replace the second sentence with, “Information requested on the log sheets includes the inspector’s name, date and time of inspection, types of problems encountered and may include the status of the item, observations, date and nature of repairs and remedial actions. The date, type, and nature of repairs or corrections will be included either on the inspection log, in the computer database, or in an inspector’s logbook. All are included in the facility operating record” (page 4-3).

Response: The changes will not be made as requested. The inspection data must be stated on the log sheets and the data must be kept for no less than 3 years at the facility. These two sentences shall read, “Information requested on the log sheets includes the inspector’s name, date and time of inspection, types of problems encountered and must include the status of the item, observations, date and nature of repairs and remedial actions. The date, type, and nature of repairs or corrections will be included on the inspection log or in an inspector’s logbook and may also be kept in the computer database. All are included in the facility operating record”.

40. **Comment:** In the proposed subsection 4.1.4 Container Inspection, the second paragraph except for the first three words delete and replace with, “within the interior fenced area of K-1065A will adhere to the required frequencies and elements for inspections. Inspection of the sealand shipping container will suffice if the contained wastes are free of liquids. If the containers hold liquid wastes, the containers inside the sealand container will be inspected” (page 4-3).

Response: The changes have been made.

41. **Comment:** In the proposed section 4.2 Operating Records, replace the last sentence with, “Operating records will be maintained for a minimum of 3 years after certified closure of the units” (page 4-3).

Response: The change has been made.

42. **Comment:** In the proposed subsection 4.2.1 Records Availability, Retention, and Disposition, delete the second paragraph (page 4-3).

Response: The change has been made.

43. **Comment:** In the proposed Appendix 4-1, Inspection Schedule for K-309 Vault 2A; replace “Warning signs” Item with “Security”; replace “In place, legible” with “Warning signs not in place or legible. Entrance locks missing or in poor condition” in that same line; and delete “& after use” in “Frequency of Inspection” from the “Housekeeping” and “Unusual situation” lines (page 4-1-1).

Response: The changes have been made.

44. **Comment:** In the proposed Appendix 4-1, Inspection Schedule for K-711 WSU, replace “Absorbents” Item with “Recovery Equipment”; replace “Locks on entrance” Item with “Security”; replace “In place, legible” with “Warning signs not in place or legible. Entrance locks missing or in poor condition” in that same line; delete “Warning signs” line; and in the “Frequency of Inspection” delete “& after use” from “Security” and “Housekeeping” line (page 4-1-2).

Response: The changes have been made.

45. **Comment:** In the proposed Appendix 4-1, delete Inspection Schedule for K-1025-C WSU. The storage container is closed.

Response: The change has been made. Closure was approved for K-1025-C WSU on June 28, 2004.

46. **Comment:** In the proposed Appendix 4-1, Inspection Schedule for K-1036-A WSU, replace "Absorbents" Item with "Recovery equipment"; replace "Locks on entrance" line with "Security" and replace "In place, charged" with "Warning signs not in place or legible. Entrance locks missing or in poor condition" in that same line; delete "Warning signs" line; and in "Frequency of Inspection" delete "& after use" from "Security" line (page 4-1-4).

Response: The changes have been made.

47. **Comment:** In the proposed Appendix 4-1, Inspection Schedule for K-1423 WSPU Dikes A, B, E, CPF, and TSCAI Repackaging Area, replace "Absorbents" Item with "Recovery equipment"; replace "Locks on entrance" Item with "Security" and replace "In place, charged" with "Warning signs not in place or legible"; delete the "Warning signs" line; and delete "& after use" in "Frequency of Inspection" from "Security" line, "Housekeeping" line, and "Unusual situation" line; add "Fire extinguisher" line with "Potential Problems" to read "Charged, in place"; and "Frequency of Inspection" to read "Weekly & after use" (page 4-1-5).

Response: The changes have been made.

48. **Comment:** In the proposed Appendix 4-1, Inspection Schedule for K-1065-A, B, C, D, E, F, G and H WSU replace "Absorbents" line with "Recovery equipment"; replace "Locks on entrance" replace with "Security"; replace "In place, charged" with "Warning signs not in place or legible. Entrance locks missing or in poor condition"; and in the "Floors/foundations/cubing/dikes" line, replace "leaks" with "liquids present"; delete the "Warning signs" line; and in the "Frequency of Inspection" delete "& after use" for "Security" line and "Housekeeping" line; (page 4-1-6).

Response: The changes have been made.

49. **Comment:** In the proposed Appendix 4-1, Inspection Schedule for Portable Units No. 1 and No. 2 delete "Cracks, spalling"; in the "Container labeling" line replace "Incomplete or improper identification" with "Proper labels/dates"; in the "Container condition" line delete "lid not closed"; add "Container closed" line with "Potential Problems" to read "Lid/bung/top not closed" and "Frequency of Inspection" to read "Weekly"; and "Frequency of Inspection" for "Security" line delete "& after use" (page 4-1-7).

Response: The changes have been made.

50. **Comment:** In the proposed Appendix 4-1, delete Tables 4-1, 4-2 and 4-3 (pages 4-1-8 through 4-1-11) because they are included in the contingency plan.

Response: The changes will not be made. The State disagrees because these items in the tables must be inspected.

51. **Comment:** In the proposed Appendix 4-2, Inspection Log for K-309 Vault 2A, in the "Frequency of Inspection" for "Security" line delete "& after use" (page 4-2-1).

Response: The change has been made.

52. **Comment:** In the proposed Appendix 4-2, Inspection Log for K-711, "Frequency of Inspection" for "Security" delete "& after use" (page 4-2-2).

Response: The change has been made.

53. **Comment:** In the proposed Appendix 4-2, Inspection Log for K-1036-A, "Frequency of Inspection" for "Security" line delete "& after use"; also delete from the "Potential Problems" the phrase "Entrance locks missing or in poor condition" (page 4-2-3).

Response: The changes have been made.

54. **Comment:** In the proposed Appendix 4-2, delete Inspection Log for K-1025-C WSU. The storage container is closed.

Response: The change has been made. Closure was approved for K-1025-C WSU on June 28, 2004.

55. **Comment:** In the proposed Appendix 4-2, Inspection Log for K-1423 WSPU Dikes A, B, CPF and TSCAI Repackaging, "Frequency of Inspection" for "Security" line delete "& after use" (page 4-2-5).

Response: The change has been made.

56. **Comment:** In the proposed Appendix 4-2, Inspection Log for K-1065-A, B, C, D or E, add "Pallets condition" Item with "Potential Problems" to read "Integrity, drums on pallets" and in the "Frequency of Inspection" add "Weekly"; add "Housekeeping" Item with "Potential Problems" to read "Cleanliness, trash" and in the "Frequency of Inspection" for "Housekeeping" Item add "Weekly"; and add in the "Frequency of Inspection" for "Recovery equipment" and "Fire Extinguishers" lines "& after use"; delete the "Sump/Flooring" Item and in the "Frequency of Inspection" for "Security" line, delete "& after use" (page 4-2-6).

Response: The changes have been made.

57. **Comment:** In the proposed Appendix 4-2, Inspection Log for K-1065-F, G, or H, in the "Frequency of Inspection" for "Security" line delete "& after use"; and in "Sump/Flooring" line in "Potential Problems" delete the word "spalling" (page 4-2-7).

Response: The changes have been made.

58. **Comment:** In the proposed Appendix 4-2, Inspection Log for Portable Unit No.1 or No.2; in the "Frequency of Inspection" for "Security" line delete "& after use" (page 4-2-8).

Response: The change has been made.

59. **Comment:** In the proposed Appendix 4-2, Standby Inspection Log, in the heading "Inspection Frequency", delete "and prior to restarting waste storage"; and at the bottom of the chart add, "Use regular inspection sheet prior to start-up" (page 4-2-9).

Response: The changes have been made.

60. **Comment:** In the proposed section 5.1 Personnel Training add a second paragraph to read, "The training program, including a description of job titles and duties, for operation of the K-1423 Repackaging Facility and associated activities in K-1423-A dike is provided in Permit TNHW-015A. The training program as described in this permit is not applicable to these activities" (page 5-2);

In the Section 5.2 in the first sentence replace the word "disposition" with the word "operation"; in section 5.2, the second sentence change item (1) from "and can demonstrate competent performance of their jobs whether they classify waste or transport hazardous wastes" to read "to manage hazardous wastes as needed to perform their job duties"; and delete the second and third paragraphs (page 5-2).

Response: The changes for section 5.2 have been made. For the Attachment 5, the change in section 5.1, the added wording in the second paragraph will not be added, because it is part of the operational records. Instead, item (3), paragraph 3 on page 5-3, the word "Tables" has been changed to "Table" in singular form, and 5-2 has been deleted; and the paragraph has been changed to read, "The amount and frequency of training is outlined in Table 5-1". The second sentence of that paragraph has been deleted. The requested change was modified because the deleted items have already required to be kept as part of the facility records.

61. **Comment:** In the proposed subsection 5.2.2 Training Content, Frequency and Techniques, in the second sentence delete the words "waste classification" and "Appendix 5-1"; in the third sentence replace the word "annual" with the word "periodic"; and in the fifth sentence replace the word "40-hour" Occupational Safety and Health Administration change to "24-hour" (pages 5-2 and 5-3).

Response: The changes have been made except for the deletion for the words, "waste classification". No justification was provided.

62. **Comment:** In the proposed subsection 5.2.2 Training Content, Frequency and Techniques, (1) Classroom instruction, delete the second sentence of the first paragraph "Testing or completion of written worksheets or exercises is required for successful completion". Delete the first bullet "(•) names of personnel responsible for site safety and health". In (2) delete "audiovisual aids" and replace with, "required reading". In (3)

at the beginning of the sentence replace “The” with “A”. Also, in the paragraph delete in the second sentence, “conducting inspections, waste classification”, and also “storage procedures”; in the third sentence, delete “associated with a particular job duty area” and also the word “duty”; and in the forth sentence, delete “waste operations staff”; in the second paragraph in (3) at the end of the sentence replace, “procedures are newly developed or revised” with “needed”; and in the third paragraph delete the first three words and comma, “The positions (title),” at the beginning of the sentence; change “Tables” to singular form and delete 5-2; and delete the last sentence in the paragraph (page 5-3).

Response: The changes have been made except for the deletion of the words “conducting inspections, waste classification”, and “storage procedures” as no justification was provided.

63. **Comment:** In the proposed subsection 5.2.3 Training Program, in the second paragraph delete the fourth sentence; “The training coordinator must be trained in hazardous waste management procedures”. Also, delete the third paragraph (page 5-4).

Response: The changes will not be made, as this is part of the Tennessee Rule.

64. **Comment:** In the proposed subsection 5.3.2, in the second paragraph, in the second sentence delete the word “generally”. Also, after the word “databases”, add “or paper copies” and near the end of the paragraph add the word “identify” (page 5-4).

Response: The changes have been made.

65. **Comment:** In the permit Table 5-1, in the “General Employee Training” Course Title, change the “Approximate Training Time” and the “Approximate Retraining Time” from “4” to “1”; in “Hazwoper” Course Title change the Approximate Training Time from “40” to “24 or 40”; in the “Hazardous Waste Operations Training” change the “Approximate Training Time” and the “Approximate Retraining Time” from “3” to “1”; in the “On-the-job operations” change the “Approximate Training Time” and the “Approximate Retraining Time” from “24” to “10” (page 5-5).

In the Footnotes, add Footnote number 3 to read, “Required training hours is dependent on the employee’s assigned responsibilities”. Also re-number the Footnotes from 4 to 5, change the numbers to 4, 5, and 6.

Requested several changes to Table 5-2 (page 5-6).

Response: The changes have been made to Table 5-1. Table 5-2 has been deleted due to reasons discussed in Comment Response Number 59.

66. **Comment:** In the proposed Appendix 5-1, Training Content-Hazardous Waste Operations Training, delete from the first sentence the phrase: “and emergency response and equipment”. Delete the following phrases from the second sentence: “are specific to job/tasks being performed and”; “hazardous waste characterization; low-level”

waste”; and “emergency procedures, communications or alarm systems, response to fires or explosions, response to hazardous material spills, and shutdown of operations” (page 5-1-1).

Response: Appendix 5-1 was deleted. See Comment Response number 59.

67. **Comment:** In the proposed Appendix 5-1, Training Content-40 Hour Hazwoper Training, in the heading replace “40” with “24” and delete from the paragraph the second sentence: “Names and telephone numbers of environmental safety and health support groups that can provide assistance are provided” (page 5-1-1).

Response: Appendix 5-1 was deleted. See Comment Response number 59.

68. **Comment:** In the proposed Appendix 5-1, Training Content-Hazwoper Training for Managers/Supervisors, in the heading delete “Managers/” and replace “40” with “24” in the text (page 5-1-1).

Response: Appendix 5-1 was deleted. See Comment Response number 59.

69. **Comment:** In the proposed Appendix 5-1, Training Content-Dot Awareness/Safety Training, delete from the second sentence of the paragraph: “specific measures the HAZMAT employer has implemented to protect employees from exposure” (page 5-1-2).

Response: Appendix 5-1 was deleted. See Comment Response number 59.

70. **Comment:** In the proposed Appendix 5-1, Training Content-On the Job Operations, delete from the third bullet the words: “identification”, “and manifesting” (page 5-1-2).

Response: Appendix 5-1 was deleted. See Comment Response number 59.

71. **Comment:** In the proposed Attachment 6, Contingency Plan has been replaced in its entirety.

Response: The change has been made.

72. **Comment:** The proposed Attachment 7, subsection 7.1 Closure Plan section add in the last paragraph in the first sentence “and addressed per the Federal Facility Agreement (FFA) for the Oak Ridge Reservation (DOE/OE-1014)”; and delete “CERCLA RA” and replace with “FFA” (page 7-2).

Response: The changes have been made.

73. **Comment:** In the proposed section 7.2. Closure Performance Standards, in the paragraph, delete the last part of the sentence containing the words, “contaminated soils, structures and equipment contaminated with waste, and/or removal or decontamination of contaminated containment system components” (page 7-2); in Table 7-1, delete unit K-1025-C and maximum volume (gal) 13,960 (page 7-4).

Response: The changes have been made. Closure was approved for K-1025-C WSU on June 28, 2004; request for a Class¹ 1 Modification dated August 27, 2004.

74. **Comment:** In the proposed subsection 7.2.1 Partial Closure and Final Closure Activities in the third paragraph Final Closure and in subsection 7.2.3 Schedule for Closure replace the year “2012” with “2014” (page 7-3).

Response: The changes have been made.

75. **Comment:** In the proposed subsection 7.2.6 Closure Procedures at the end of the second paragraph add: “A decision will be made to determine if the unit will be clean closed and left in place or demolished and removed. If the unit is identified for demolition, decontamination of equipment will be performed and debris will be disposed of as RCRA waste accordingly. If the unit is to be clean closed, the following decontamination procedures will apply” (page 7-7).

Response: The changes have been made.

76. **Comment:** In the proposed section 7.3, Inventory Removal, Disposal and Decontamination of Equipment, in the subsection Decontamination of Equipment and Structures, in the second paragraph, third sentence delete “Contaminated areas will be cleaned by”, and replace with “Methods to decontaminate may include, but are not limited to” and delete “if needed”; add to the fourth sentence, “and the method”; add “One option of decontamination verification is to analyze final rinse waters for hazardous constituents that have leaked or spilled in the unit”; delete “As a means of decontamination verification, rinse waters will be analyzed for the hazardous constituents formerly stored in the unit”; and add to the sixth sentence “The number, types of samples (debris, water, wipes, etc.) and analyses”; Delete “samples” and “analyzed using” and replace with “based on”; in the third paragraph in the first sentence, delete the word “residual” and after the word “exists” add the words “above regulatory levels” (page 7-7).

Response: The changes have been made; request for a Class¹ 1 Modification dated August 27, 2004.

77. **Comment:** In the proposed section 7.3, Inventory Removal, Disposal and Decontamination of Equipment, in the subsection Removal of Equipment and Structures in the first sentence delete the word “all” and replace with the word “the”; in the first sentence after the word “units” add “identified to be left in place”; add a period after the word “decontaminated”; add in the second sentence, after the word “structures” the words “may be identified for reuse in other permitted facilities (i.e., repackaging tables,

hoods, racks, etc.) and will be removed/transported to the existing facility”; add a third sentence “Equipment and structures left in place that; replace the word “meeting” with the word “meet”; and delete “and can be left in place or demolished and land disposed”; and add “for future use or disposition” (page 7-8).

Response: The change has been revised in Comment Number 78.

78. **Comment:** In the proposed section 7.3, Inventory Removal, Disposal and Decontamination of Equipment, in the subsection Soil Assessment in the first paragraph delete the last sentence; delete the second, third and fourth paragraphs; in the fifth paragraph at the beginning and in the middle of the second sentence change the word “will” to the word “shall”; at the end of the sentence before the words “CERCLA RA” add the word “the”; and after the word “CERCLA RA” add “(Name and date of approved CERCLA RA)”; and also delete the sixth paragraph (page 7-8).

Response: The changes have been made.

79. **Comment:** In the proposed section 7.3, Inventory Removal, Disposal and Decontamination of Equipment, Soil Assessment, delete paragraphs seven through eleven (page 7-10); delete Table 7-3 “Decontamination Criteria” (page 7-9); and delete Table 7-4 “Estimated Equipment Requiring Decontamination During Closure” (page 7-12).

Response: The changes have been made. A request for a Class¹ 1 Modification dated August 27, 2004.

80. **Comment:** In the proposed section 8.1, Container Management, add “with the exception of neutralization, removal of incidental liquids, and the addition of absorbents”; delete, “Neutralization in containers may occur in K-1423 WSPU, K-1065-A, -B, -C, -D, and -E WSUs. All of the WSUs included in this permit have secondary containment to enable storage of wastes with free liquids” (page 8-2).

Response: The change will be made except the word incidental will be removed from the attachment per email dated August 5, 2004 from Tom Perry. Section 8.1 shall read, “A list of container storage units that will store wastes is provided below. Containers will be used only to store waste and not treat, with the exception of neutralization, stabilization/inhibiting of wastes that could form shock sensitive wastes such as peroxides, and removal of liquids/addition of absorbents. Wastes are stored and managed in containers compatible with the waste types”.

81. **Comment:** In the proposed subsection Containers With Free Liquids, delete in the heading “With Free Liquids”; delete the first sentence “with free liquids”; and delete at the end of the sentence “that will receive containers with free liquids”; delete container storage unit K-1025-C WSU; add in section 8.1 “Treatment Capacities” for the units, as previously requested in the Class 2 Modification dated September 26, 2003; in the third

(second) paragraph in the first sentence replace the word “and” with the words “or by”; and delete “generators and other non DOE generators as approved by TDEC” (page 8-2).

Response: The changes have been made. A Closure Certification was granted for K-1025-C WSU on June 28, 2004.

- 82. Comment:** In the proposed subsection 8.1.1, in the paragraph, delete the first sentence and in the second (first) sentence delete the word “permanent”; in the second paragraph delete the second sentence that references, “The live load capacity of K-1025-C WSU is 400 lb/ft³”; in the second paragraph, in the last sentence after the word concrete, add a comma; and add “in areas storing containers of liquid hazardous wastes”; at the end of the sentence add, “or a portable secondary containment will be used”; and add a third paragraph, “If areas have been identified to store solids only, secondary containment will not be required. If incidental liquids are identified in these areas, absorbent will be added to remove the incidental liquids” (page 8-2). The word incidental was removed from the attachment per email dated August 5, 2004 from Tom Perry.

Response: The changes have been made except for the addition of the last sentence in the second paragraph. A Closure Certification was granted for K-1025-C WSU on June 28, 2004.

- 83. Comment:** In the proposed subsection 8.1.1, K-309-Vault 2A, in the second sentence end the sentence with curbing and delete “that provides secondary containment for the unit”; replace the word “unit” with the word “area”; delete the fourth sentence and delete the beginning of the seventh sentence and replace it to read, “The maximum storage volume is based on secondary containment calculations provided in Appendix 8-1”; add a second paragraph: “The K-23 Building roof leaks have become impracticable to repair, so the following mitigating measures have been/will be taken to minimize the impact of any rainwater infiltration to K-309-Vault-2A”:

- All RCRA mixed wastes that can be removed from this location to other permitted storage have been moved.
- All waste containers are placed on pallets to prevent contact with any accumulated rainwater; and located away from any drips.
- In addition to weekly inspections, K-309 Vault-2A WSPU will be inspected following significant precipitation events for accumulation of any water (page 8-4).

However on August 5, 2004, Tom Perry submitted by email; On page 8-4, the last paragraph under K-1423 WSPU beginning with, “The K-23 Building roof leaks have become” should be deleted from this section, and added as the last paragraph under the heading K-309-Vault 2A and changed from “rainwater infiltration to K-1423,” to “rainwater infiltration to K-309-Vault 2A” (page 8-3). In reference to “concrete curbing” under “K-309-Vault 2A,” we propose deleting, “that provides secondary containment for the unit”. “While there is curbing, it is not accurate to take credit for “secondary

containment" because of cracks in the floor. Since there is no storage of liquid hazardous waste, secondary containment would not be required. Bechtel Jacobs and its subcontractor are trying to move all remaining waste out of Vault 2A, discontinue waste storage there, and RCRA close the unit by early 2005.

Response: The changes have been made

84. **Comment:** In the proposed subsection 8.1.1, K-1036-A WSU, delete the seventh sentence, "All joints and cracks have been sealed with epoxy grout and, in some cases, silicone sealant"; and delete the last sentence and add, "The maximum storage volume is based on secondary containment calculations provided in Appendix 8-1" (page 8-3).

Response: The change will not be made for the first item. The floor was certified how the joints, cracks and etc. shall be sealed.

85. **Comment:** In the proposed subsection 8.1.1, K-711 WSU, in the last sentence change Appendix "8-3" to "8-1" (page 8-3).

Response: The change has been made.

86. **Comment:** In the proposed subsection 8.1.1, delete container K-1025C WSU subsection (page 8-3).

Response: The change has been made. Closure was approved for K-1025-C WSU on June 28, 2004.

87. **Comment:** In the proposed subsection 8.1.1, K-1423 WSPU, in sentence seven replace the word "will" with the word "can". In the tenth sentence add "received, mixed, blended, bulked, stored", so that it reads, "In the Repackaging Area, the contents of containers are received, mixed, blended, bulked, stored, sorted and repackaged in preparation for treatment at the ETPP TSCA Incinerator"; and add an eleventh and twelfth sentence "Absorbent is added to containers discovered to contain incidental liquids when containers are opened prior to repackaging. Containers of secondary waste are generated as part of the repackaging process including items in containers that are not appropriate for incineration"; in sentence thirteen add after the word comfort "and to remove head gases from containers as needed prior to repackaging"; at the end of sentence fourteen change "Drawings 8-2-5 through 8-2-8" to "Drawings 8-2-4 through 8-2-7"; and at the end of the last sentence change Appendix "8-3" to "8-1" (page 8-4).

However on August 5, 2004, Tom Perry submitted by email; On page 8-4, the last paragraph under K-1423 WSPU beginning with, "The K-23 Building roof leaks have become" should be deleted from this section, and added as the last paragraph under the heading K-309-Vault 2A.

Response: The changes have been made, except for the word incidental will not be added in the eleventh sentence.

88. **Comment:** In the proposed subsection 8.1.1, K-1065-A WSU, in the sixth sentence end the sentence with “area” and delete “for the storage of classified wastes”; change, “The plan view of this storage unit is shown in Drawing 6-2-2, Appendix 6-2” to “The plan view of this storage unit is shown in Drawing 8-2-8, Appendix 8-2”; and at the end of the last sentence change Appendix “8-3” to “8-1” (page 8-4); in K-1065-B, C, D, and E WSUs, change “The plan view of this storage unit is shown in Drawing 6-2-3, and 6-2-4 Appendix 6-2” to “The plan view of this storage unit is shown in Drawings 8-2-9, and 8-2-10 Appendix 6-2”; and at the end of the last sentence change Appendix “8-3” to “8-1” (page 8-4); in K-1065-F WSU, change “An engineering drawing of the units is provided as Drawing 6-2-6 Appendix 6-2” to “An engineering drawing of the units is provided as Drawing 8-2-11 Appendix 8-2”; and at the end of the last sentence change Appendix “8-3” to “8-1” (page 8-5); in K-1065-G and H WSUs, change “An engineering drawing of the units is provided as Drawing 6-2-7 Appendix 6-2” to “An engineering drawing of the units is provided as Drawing 8-2-12 Appendix 8-2”; and at the end of the last sentence change Appendix “8-3” to “8-1” (page 8-5).

Response: The changes have been made.

89. **Comment:** In the proposed subsection 8.1.1, Portable No. 1 and No. 2, in the first paragraph change “An engineering drawing of the units is provided as Drawing 6-2-5 Appendix 6-2” to “An engineering drawing of the units is provided as Drawing 8-2-13 Appendix 8-2”; and in second paragraph at the end of the last sentence, change Appendix “8-3” to “8-1” (page 8-5).

Response: The changes have been made.

90. **Comment:** In the proposed subsection 8.1.2, in the third sentence, delete the words “consist of” and replace with “include, but is not limited to”; delete the word “or”; add after the words “open container” the words “or temporary diking”; and delete “that has the capacity to capture the volume of the largest container placed upon it and enables inspection of waste containers” (pages 8-5 and 8-6).

Response: The changes have been made.

91. **Comment:** In the proposed subsection 8.1.3, in the second paragraph delete the first sentence; in the second sentence delete “no”, add “significant quantities of” and delete “is” and replace with “are not” (page 8-6).

Response: The changes have been made

92. **Comment:** In the proposed subsection 8.1.4, in the third paragraph at the end of the first sentence replace Appendix “8-3” to “8-1” (page 8-7).

Response: The change has been made.

93. **Comment:** In the proposed subsection 8.1.6, delete the second paragraph and replace with “Vault 2A is the only WSU remaining in the K-25 Building. A limited amount of solid hazardous waste remains in this storage unit and no other hazardous waste is planned to be stored there. Vault 2A is scheduled to be emptied and RCRA closed in 2005, and the K-25 Building is expected to be demolished and removed as part of a CERCLA action by the end of 2008. The K-25 Building roof leaks have become impracticable to repair, so the following mitigating measures have been/will be taken to minimize the impact of any rainwater infiltration to Vault 2A:

- All RCRA mixed wastes that can be removed from this location to other permitted storage have been moved.
- All waste containers are placed on pallets to prevent contact with any accumulated rainwater; and located away from any drips.
- In addition to weekly inspections, Vault 2A will be inspected following significant precipitation events for accumulation of any water”.

Also in the third paragraph add, “based on process knowledge and/or”, delete “and”; and delete at the end of the paragraph the words “waste acceptance” (page8-6).

Response: The changes have been made.

94. **Comment:** In the proposed subsection 8.2.1, in the fifth sentence delete the letters “ly” from the word “separately” and the word “diked” (page 8-8).

Response: The changes have been made.

95. **Comment:** In the proposed subsection 8.2.2, in the third paragraph at the end of the sentence delete “except K-1025-C WSU”; and delete the fourth paragraph (page 8-8).

Response: The changes have been made. Closure was approved for K-1025-C WSU on June 28, 2004.

96. **Comment:** In the proposed subsection 8.2.4, in the first paragraph in the first sentence delete “in the paragraph entitled “Containers with Free Liquids”; in the second sentence delete the word “and” after the word repackaging; and delete “K-1423 WSPU and K-1065-A, -B, -C, -D, and -E”, and add the word “the”; in the second paragraph at the end of the first sentence, delete the word “floor” and add “as described in Section 8.1.3”; and delete the second sentence (page 8-10).

Response: The changes have been made.

97. **Comment:** In the proposed subsection 8.4.1, in the fourth paragraph, at the end of the first sentence, delete “except K1025C WSU”; and in this same paragraph, delete the second, and third fourth sentences (page 8-13).

Response: The changes have been made. Closure was approved for K-1025-C WSU on June 28, 2004.

98. **Comment:** In the proposed subsection 8.4.2, in the second paragraph, in the first sentence, delete K-1025-C; in the third paragraph, in the second sentence, add “containers of liquid hazardous”, delete “containing free liquids have a”; and add “are stored in”; and in the last sentence replace the word “material” with the word “waste” (pages 8-13 and 8-14).

Response: The changes have been made. Closure was approved for K-1025-C WSU on June 28, 2004.

99. **Comment:** In the proposed subsection 8.4.4, in the first sentence delete the word “handing” and replace with “handling” (page 8-14).

Response: The change has been made.

100. **Comment:** In the proposed subsection 8.4.5, in the first paragraph, in the second sentence capitalize the words “Hygiene and Radiological Control”; in the last sentence in the paragraph, add “and periodic updates”; and delete “and the annual update” (page 8-14).

Response: The changes have been made.

101. **Comment:** In the proposed subsection 8.5, after the second paragraph, add a third paragraph to read, “Portable fire extinguishing equipment is also available at each of these units for fire suppression. The K-1065-A, -B, -C, -D, and -E WSUs also have overhead, wet-pipe sprinkler systems and are inside buildings;” delete in the new fourth paragraph the last two sentences, “Portable fire extinguishing equipment is also available at each of these units for fire suppression. The K-1065-A, -B, -C, -D, and -E WSUs have overhead, wet-pipe sprinkler systems and are inside buildings” (page 8-15); in the section titled Management of Ignitable or Reactive Waste in Containers, in the second paragraph in the second and third sentences, delete “K-1025-C and” (page 8-15); and in the section Management of Incompatible Waste in Containers, in the seventh sentence delete “labeling with information identifying the waste” (page 8-16).

Response: The changes have been made. Closure was approved for K-1025-C WSU on June 28, 2004.

102. **Comment:** In Attachment 8, add Section 8.6, “Treatment In Containers” (pages 8-16 through 8-20).

Response: The changes have been made.

103. **Comment:** In the proposed Appendix 8-1, delete “Container Management Calculations K-1025 C WSU, Dikes 1-6” (page 8-1-9).

Response: The changes have been made. Closure was approved for K-1025-C WSU on June 28, 2004.

- 104. Comment:** In the proposed Appendix 8-2, delete Drawing 8-2-4 K-1025-C Storage Building and renumber Drawings 8-2-5 etc.

Response: The changes have been made. Closure was approved for K-1025-C WSU on June 28, 2004.

- 105. Comment:** In the proposed subsection 8.1.1, in "K-1423 WSPU", at the end of the paragraph change, Drawings "8-2-5 through 8-2-8" to "8-2-4 through 8-2-7"; in "K-1065-A" change, Drawing "6-2-3" to "8-2-8"; in "K-1065-B, C, D and E WSUs", change Drawing "6-2-3" and "6-2-4" to "8-2-9" and "8-2 10"; K-1065-F change Drawing "6-2-6" to "8-2-11"; in "K-1065-G" and "H WSUs", change Drawing "6-2-7" to "8-2-12"; and in Portable Units No. 1 and No.2, change Drawing 6-2-5 to 8-2-13" (pages 8-4, 8-5 and 8-6)

Response: The changes have been made. Referenced in the final permit cover letter.

- 106. Comment:** In the proposed section 7.2 CLOSURE PERFORMANCE STANDARD, in the Notice of Intent to Close, at the end of the paragraph add, "The permittee will provide justification for closure of the unit(s) under CERCLA instead of RCRA and must receive approval from the Commissioner of TDEC prior to such closure" (page 7-2).

Response: The change has been made.

- 107. Comment:** In the proposed section 7.4 Certifications and Notices Required, at the end of the paragraph after the words certification of closure add, "by an independent professional engineer" (page 7-11).

Response: The change has been made.